

COUNT I

6. Plaintiff repeats and realleges its responses to paragraphs 1 – 5, as if fully set forth herein.

7. Admitted that what purports to be a copy of Plaintiff's asserted copyright registration is attached as Defendant's Exhibit A. Plaintiff lacks information sufficient to form a belief as to the truth of the remaining allegations, and therefore denies the same.

8. Plaintiff lacks information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

9. Denied.

10. Plaintiff lacks information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

11. Plaintiff lacks information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

12. Admitted that an application to register Plaintiff's work was filed with the U.S. Copyright Office. Otherwise, Plaintiff lacks information sufficient to form a belief as to the truth of the remaining allegations, and therefore denies the same.

13. Plaintiff lacks information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

14. Admitted that Plaintiff did not disclose the images of Exhibit B to the Copyright Office. Otherwise, denied.

15. Denied.

16. Denied.

17. Denied.

18. Denied.

19. Denied.

COUNT II

20. Plaintiff repeats and realleges its responses to paragraphs 1 – 19, as if fully set forth herein.

21. Denied.

22. Denied.

23. Denied.

COUNT III

24. Plaintiff repeats and realleges its responses to paragraphs 1 – 23, as if fully set forth herein.

25. Denied.

26. Plaintiff lacks information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. Also denied as calling for a legal conclusion.

WHEREFORE, Plaintiff, by its below counsel, prays that:

- A. Defendant takes nothing by way of its Counterclaims;
- B. Judgment be entered in this action in favor of Plaintiff, based on Plaintiff's Complaint, and against Defendant;
- C. Plaintiff be awarded its costs, expenses and attorneys' fees in this action; and

D. Plaintiff be awarded such other and further relief as the Court deems just and proper.

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Dated: March 22, 2017

By: /Michael R. Gilman/
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CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the above subject document was served on the below identified counsel for Defendant, on this 22nd day of March, 2017, via ECF, with a courtesy copy by email:

Ralph H. Cathcart, Esq.
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Dated: March 22, 2017

By: /Michael R. Gilman/
Michael R. Gilman (MG 7608)